



~~United States District Court~~
~~United States District Office~~
Eastern District of New York

AH
F.#2008R00052

271 Cadman Plaza East
Brooklyn, New York 11201

December 5, 2012

By ECF

All Defense Counsel

Re: United States v. Conrad Ianniello, et al.
Criminal Docket No. 12-264 (NGG)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. The government hereby reiterates its request for reciprocal discovery.

- On or about March 19, 2010, a cooperating witness ("CW#2") made a consensually recorded conversation with Conrad Ianniello, among others who are not defendants in this case. A copy of that recording is available on a disk bates stamped Discovery Exhibit 11.¹
- On or about and between February 25, 2008 and October 16, 2008, a cooperating witness ("CW#3") made consensually recorded conversations that either concerned, or involved, Ryan Ellis and Conrad Ianniello, among others who are not defendants in this case. A copy of those recordings is available on a disk bates stamped Discovery Exhibit 12.
- Discovery Exhibit 13 consists of various documents associated with Local Union No. 7, M & M Marble & Tile Inc. and/or the Paramount Hotel.²

¹ This recording was previously produced to defense counsel for Ianniello on a disk bates stamped IA 1.

² The documents contained in Discovery Exhibit 13 were previously produced to defense counsel for Squitieri as documents bates stamped SQU000000001 - 320.

The discs described herein are available at DupeCoop. You may obtain these materials by contacting John Palermo at (973) 895-1359 and referencing the associated Bates numbers.

Please contact me if you have any questions or additional requests.

Very truly yours,

LORETTA E. LYNCH
UNITED STATES ATTORNEY

BY: /s/
Amanda Hector
Assistant U.S. Attorney
(718) 254-6212

cc: Clerk of Court (NGG)